

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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MUSA B. ALIU, on behalf of himself and
All others similarly situated,

Plaintiff,

-against-

RUBIN & ROTHMAN, LLC,

Defendant(s).

ANSWER

08 CIV 4727
(Lynch, J)

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Defendant, by its attorney MEL S. HARRIS AND ASSOCIATES,
LLC, answer plaintiff's complaint as follows:

1. Defendant acknowledges being sued under the Fair Debt
Collection Practices Act, but denies any violation of that statute.

2. Defendant admits that the Court has jurisdiction over
this matter.

3. Defendant admits the allegations contained in paragraph
"3" of the complaint.

4. Defendant denies knowledge or information sufficient to
form a belief as to each and every allegation contained in paragraph
"4" of the complaint.

5. Defendant admits the allegations contained in paragraph
"5" of the complaint.

6. Defendant denies each and every allegation contained in
paragraph "6" of the complaint.

7. Defendant denies each and every allegation contained in paragraph "7" of the complaint.

8. Defendant denies each and every allegation contained in paragraph "8" of the complaint.

9. Defendant denies each and every allegation contained in paragraph "9" of the complaint.

10. Defendant denies each and every allegation contained in paragraph "10" of the complaint.

11. Defendant denies each and every allegation contained in paragraph "11" of the complaint.

12. Defendant denies each and every allegation contained in paragraph "12" of the complaint.

13. Defendant denies knowledge or information sufficient to form a belief as to each and every allegation contained in paragraph "13" of the complaint.

14. Defendant denies each and every allegation contained in paragraph "14" of the complaint.

15. Defendant admits sending plaintiff correspondence dated April 18, 2008.

16. Defendant admits the allegations contained in paragraph "16" of the complaint.

17. Defendant denies knowledge or information sufficient to form a belief as to each and every allegation contained in paragraph "17" of the complaint.

18. Defendant denies knowledge or information sufficient to form a belief as to each and every allegation contained in paragraph "18" of the complaint.

19. Defendant denies each and every allegation contained in paragraph "19" of the complaint.

20. Defendant denies each and every allegation contained in paragraph "20" of the complaint.

21. Defendant denies each and every allegation contained in paragraph "21" of the complaint.

22. Defendant denies each and every allegation contained in paragraph "22" of the complaint.

23. Defendant denies each and every allegation contained in paragraph "23" of the complaint.

AS AND FOR A FIRST AFFIRMATIVE DEFENSE

24. Any violation of law by defendant, which is specifically denied, was not intentional and resulted from a bona fide error notwithstanding the maintenance of procedures reasonably adapted to avoid any such error.

WHEREFORE, the defendant respectfully requests that plaintiff's complaint be dismissed.

Dated: New York, NY
July 29, 2008



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